



DEPARTMENT OF THE NAVY
NAVAL FACILITIES ENGINEERING COMMAND
ATLANTIC
6506 HAMPTON BLVD
NORFOLK VA 23508-1278

11/3/05 - 02554

TELEPHONE NO:

IN REPLY REFER TO:

November 3, 2005

U.S. Department Of Interior Fish & Wildlife Service
Boqueron Field Office
Attn: Mr. Edwin E. Muñiz
Field Supervisor
Carr. 301, KM 5.1, Bo. Corozo
PO Box 491 Boqueron, PR 00622

Re: Substantive Requirements of the Endangered Species Act for the Remedial Investigation and Removal Action at Area of Concern (AOC) R, Former Naval Ammunition Support Detachment (NASD), Vieques, Puerto Rico

Dear Mr. Muñiz:

As discussed in our letter dated June 30, 2005, the Navy intends to meet the substantive requirements of the Endangered Species Act of 1973 (ESA), and its amendments, under the provisions of Comprehensive Environmental Response Compensation and Liability Act (CERCLA). In accordance with these requirements, a threatened and endangered species evaluation was conducted on our behalf by Geo-Marine Inc. (GMI) in advance of a remedial investigation (RI) and removal action (RA) to be conducted at Area of Concern (AOC) R on the former Naval Ammunition Support Detachment (NASD). This letter summarizes the work to be completed at AOC R and the results of the threatened and endangered species evaluation.

Project Description

The RI and RA at AOC R are to be conducted as part of the Environmental Restoration Program (ERP) for the former NASD. The RI and RA are part of the CERCLA process and are intended to help evaluate the nature and extent of contamination present at the site and the potential human health and ecological risks posed by the contamination. A draft RI work plan has been prepared and is currently under regulatory review.

The following actions will be performed as part of the AOC R RI and RA:

1. Site preparation, including vegetation removal from the areas to be investigated. The vegetation removal will be conducted primarily using either mechanical brush cutting equipment or hand tools such as machetes and weed eaters. Vegetation will be cleared to approximately ground level, with minimal soil disturbance, to facilitate access to sampling locations by drilling rigs. In addition, removal of debris will be conducted as necessary to supplement the investigation.

Quality Performance ... Quality Results

2. Following site preparation, a visual inspection of the site for surface munitions items using metal detectors

Once the vegetation clearance activities and munitions survey completed, personnel and drilling rigs will access the cleared areas to drill soil borings and install monitoring wells.

All munitions items and debris found will be removed, as necessary. If any munition is fused or otherwise deemed unsafe to move, the items will be removed by detonation in place. The surface removal will consist of detonating the munitions items with an explosive charge, then removing the metallic scrap to a central holding area for subsequent off-site disposal.

Summary of Geo-Marine Threatened and Endangered Species Survey Report

In September 2005, GMI conducted a flora and fauna survey, with 100 percent coverage, of AOC R (approximate area of 5 acres). The purpose of this evaluation was to identify habitat or potential habitat that is currently in or could be used by the Least Tern (*Sterna antillarum antillarum*), Roseate Tern (*Sterna dougalii dougalii*), or any other listed endangered, threatened, critical or sensitive avian species. Additionally, a survey of the flora and fauna was conducted to determine if any State or Federally listed species were present.

There were no federally or state protected species or preferred habitats observed in the area where investigations will be conducted at AOC R. However, outside the area of investigation, along the ephemeral stream that borders the site, but downgradient of the site, away from where RI activities will be conducted, two individuals of *Stahlia monosperma* were identified. Their locations, with respect to AOC R, are shown on the attached figure. In addition, one large individual of a hybrid *Coccoloba* species, which is not a listed endangered or threatened species, was observed. This same hybrid species has been observed on the east end of the island in the former Live Impact Area. A copy of this report will be provided to the US Fish and Wildlife Service (USFWS) once it is provided by GMI.

Conservation Measures

As a conservation measure, the threatened and endangered species survey was conducted. Because there were no listed endangered, threatened, critical or sensitive species or habitat (flora or fauna) within the area to be investigated during the AOC R RI and RA, no additional conservation measures are necessary for the AOC R area. However, if future activities are likely to take place in the vicinity of the *Stahlia monosperma* identified in the attached figure, conservation measures will be implemented. The conservation measures will consist of establishing a buffer zone around the *Stahlia monosperma* to prevent their accidental damage or destruction. The size of the buffer zone will be the radius of the approximate root area (estimated by the horizontal distance from the trunk of the tree to the tip of the branch farthest from the trunk) plus an additional 10 feet. During any investigation/remediation activity in the vicinity of these *Stahlia monosperma* specimens, physical barriers (e.g., posts and barricade tape) will be set up. The barriers will be removed following the investigation/remediation activities.

Summary

Based upon the results of the GMI survey, the Navy has determined that the proposed RI and RA at AOC R will not affect federal or state threatened/endangered listed flora or fauna species. We trust that you will find that the Navy has cooperated in good faith by conducting the survey prior to site preparation and RI and RA activities. The Navy is notifying USFWS that the Navy is meeting the intent of the CERCLA ARARs.

November 3, 2005

We appreciate your input in this process and look forward to continue the communication flow between the agencies. If you have any questions, please don't hesitate in contacting me at 757-322-4787.

Sincerely,



Jeffrey C. Harlow
Western Vieques Remedial Project Manager
Naval Facilities Engineering Command Atlantic
Environmental Division
By direction of the Commander

Copy to:

PREQB (Ms. Yarissa Martínez)

NAVFAC ATLANTIC (Messrs. Byron Brant, Christopher Penny, Johnny Noles)

USEPA (Mr. Daniel Rodríguez)

DOI (Ms. Susan Silander; Messrs. Bud Oliviera, Oscar Díaz, Félix López)

CH2MHILL (Messrs. Brett Doerr, John Tomik, Ms. Susana Struve)

DNER (Mr. Craig Lilyestrom)